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August 17, 2021

**Via ECF**

The Honorable Judge Katherine Polk Failla  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Tatum-Rios v. Beni Rugs, Inc., No. 21-cv-3433**

Dear Judge Failla:

We represent defendant Beni Rugs, Inc. ("Defendant") in the above-referenced matter. Together with counsel for Plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty-five (45 days), from August 17, 2021 to October 1, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Sincerely,

DENTONS COHEN & GRIGSBY P.C.

*/s/ Lucy E. Hill*

By: Lucy E. Hill

LEH/chl

Copy to: All counsel of record (via ECF)

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Davis Brown ► East African Law Chambers ► Eric Silwamba, Jalasi and Linyama ► Durham Jones & Pinegar ► LEAD Advogados ► Rattagan Macchiavello Arocena ► Jiménez de Aréchaga, Viana & Brause ► Lee International ► Kensington Swan ► Bingham Greenebaum ► Cohen & Grigsby ► Sayarh & Menjra ► Larrain Rencoret ► For more information on the firms that have come together to form Dentons, go to [dentons.com/legacyfirms](https://dentons.com/legacyfirms)

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Application GRANTED. All deadlines and conferences in this matter are hereby adjourned. Furthermore, the Court ORDERS that this action be conditionally discontinued without prejudice and without costs; provided, however, that on or before **October 1, 2021**, the parties may submit to the Court their own Stipulation of Settlement and Dismissal for the Court to So Order. Otherwise, within such time Plaintiff may apply by letter for restoration of the action to the active calendar of the Court in the event that the settlement is not consummated. Upon such application for reinstatement, the parties shall continue to be subject to the Court's jurisdiction, the Court shall promptly reinstate the action to its active docket, and the parties shall be directed to appear before the Court, without the necessity of additional process, on a date within ten (10) days of the application, to schedule remaining pretrial proceedings and/or dispositive motions, as appropriate. This Order shall be deemed a final discontinuance of the action with prejudice in the event that Plaintiff has not requested restoration of the case to the active calendar on or before **October 1, 2021**.

The Clerk of Court is directed to terminate all pending motions, adjourn all remaining dates, and close this case.

SO ORDERED.

Dated: August 17, 2021  
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE